UNITED	STATES	DISTRI	CT CO	URT
SOUTHE	ERN DIST	RICT O	F NEW	YORK

TIANHAI LACE USA, INC.,

Civil Action No. 19 Civ. 4808 (NB)

Plaintiff,

RULE 7.1 STATEMENT BY LORD & TAYLOR, LLC

-against-

LORD & TAYLOR LLC, et al.,

Defendants.

Pursuant to Federal Rule of Civil Procedure 7.1 and to enable District Judges and Magistrate Judges of the Court to evaluate possible disqualification, the undersigned counsel for Lord & Taylor LLC (a private non-governmental party) certifies:

Hudson Bay Company is the parent of Lord & Taylor LLC.

Dated: New York, New York October 2, 2019

> Respectfully submitted, SILLS CUMMIS & GROSS P.C. Attorneys for Defendants Lord & Taylor LLC and Kellwood Company, LLC

By: s/Kenneth R. Schachter
Kenneth R. Schachter
kschachter@sillscummis.com
Kate Lieb, Esq.
klieb@sillscummis.com
101 Park Avenue
New York, New York 10178
(212) 643-7000